

EXHIBIT 5

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

CASE NO. 2:23-cv-01438

ASSATA ACEY,) REMOTE
Plaintiff(s),) DEPOSITION OF:
v.) OMAR JACKSON
INDUCTEV,)
Defendant(s).)
_____)

TRANSCRIPT of the stenographic notes of
the remote proceedings in the above-entitled matter,
as taken by and before , a Certified
Court Reporter and Notary Public of the State of New
Jersey, held via video conference, on Wednesday,
April 3, 2024, commencing at 12:05 p.m.

Job No. CS6630993

1 or even farther than that from where I lived at.

2 Q. Okay. But it had nothing to do with a
3 dispute at work?

4 A. Oh, no. I had no dispute at work.
5 Honestly, I -- I don't -- I shouldn't get into that
6 part. I shouldn't get into that part.

7 Q. What do you mean?

8 A. The company -- I feel like the company
9 saved my life; you know, because they gave me a job
10 when I was down, when my wife was down. I was
11 depressed at that time at the job. So that's why I
12 had my headphones on. That's why I stayed to myself.

13 That's why I just came and I did my
14 work. So I came five o'clock in the morning, opened
15 the shop up. They trusted me enough to give me the
16 key to open the shop. Everybody had the key, but I
17 turned the alarms and stuff off.

18 You know, that company helped me, so
19 that's how I feel about the company. Whether they
20 was going in a different direction -- I just didn't
21 see my family being able to eat later. That's how I
22 felt, so I had to find a new job.

23 Q. Understood.

24 Purely business decisions?

25 A. That's all. That's all. It was a

1 A. I'm sorry.

2 Q. What is it about what you saw with
3 respect to Ms. Acey's behavior that led you to
4 believe that she was uncomfortable?

5 A. Because she -- I guess the way she sat
6 inside the -- the cabinet one day. And she was just
7 in there, and she wouldn't say anything.

8 I went and ask her how she was doing.
9 She ignore me. She would always say something, but
10 that day she didn't. All I know whether she had
11 problems -- I mean, Joren was the guy that she would
12 talk to.

13 And so like, you know, I try to stay out
14 of things, so I never even asked. And, you know,
15 just didn't ask.

16 Q. Okay. She -- you have no -- you have no
17 sense of why she would have been
18 uncomfortable; right?

19 A. No. Nope.

20 Q. Did you ever hear anything that you
21 understood to be racial animus directed toward Ms.
22 Acey?

23 A. I don't know any of that. No.

24 Q. During your time at InductEV, did you
25 ever hear anything that you understood to be racial

1 during that conversation?

2 A. I may have said something like that.
3 Honestly, in me being angry, I probably said, if I
4 was a white guy, I probably would have had this
5 already, honestly.

6 But when I -- when I talk to myself, and
7 I said Seth is in the same position, and he's a white
8 guy. He's been here longer than me. He doesn't have
9 it. So I had to nullify everything that I said. I
10 know I said it, sitting here talking about it. I
11 know those type of words came out of my mouth.

12 I don't even know if Seth was around.
13 It might have been just me and Assata. I almost
14 think there was a third person there, because I was
15 so upset when we was talking. She said -- I think
16 she was saying you do deserve it. That's what she
17 was saying, you do deserve it.

18 Q. Who was saying that?

19 A. Assata, she was saying that.

20 But at that time, you know, Seth was
21 working the same thing, so how can I say that and
22 feel like, you know. I had to step back and
23 understand where I was at, and like where he was at
24 at the same time. I dropped that.

25 When I did go in there and talk to Joren

1 about my raise, I was like, What about Seth? And I
2 didn't know Seth was gonna get it either. But one
3 day Seth came out the office and said, I got
4 promoted. I said, Well, you deserved it, Seth.

5 But I know -- I know I said those words.
6 It was race coming out of my mouth. It was. And I
7 felt like at that point, man, I don't know. I was
8 speaking out of anger. I know I was.

9 Q. You don't -- you don't stand behind
10 those words today; right?

11 A. No. No. No. I don't. No. I don't.

12 That's why I say I step back, actually,
13 stepped back, and talked to my daughters.

14 You know, everything I go through -- I
15 only have my kids. I only have them. So I come
16 home. I talk to them. And, you know, we rationalize
17 things out. And that's how I -- you know, I try to
18 be a level guy. You know what I mean.

19 Everything is fair across the board, so,
20 you know, even in my job experience today, how did I,
21 you know, in a predominantly white steel mill right
22 now, I go in and get what I get and get promoted just
23 like I got. So, no, I don't think that. So, no.

24 Q. Understood.

25 Do you remember Ms. Acey discussing race

1 with you during that conversation?

2 A. I can't remember what she said. I know
3 what I said. I was -- I dominated that conversation.
4 I don't know if she did say anything. I don't recall
5 what she said.

6 Q. Okay. Let's take a five to six minute
7 break. Let's resume the deposition at 1:15. Okay?

8 MS. ACEY: I want to remind you that I
9 do need to pause at 1:45 to get my son from school.

10 MR. LONGO: Yeah. You said you'll be
11 about ten minutes?

12 MS. ACEY: Yes.

13 MR. LONGO: That's fine. Let's come
14 back at 1:15, please.

15 (Discussion held off the record.)

16 (Whereupon a short break was taken.)

17 Q. Okay. We are back on the record.

18 Mr. Jackson, during your time working
19 with Ms. Acey, did Ms. Acey ever indicate to you that
20 she could do her -- could do certain jobs better than
21 other InductEV employees?

22 A. No. Not that I can recall. No.

23 Q. Did you ever get the impression that Ms.
24 Acey believed that she was smarter than other
25 InductEV employees?

1 time while at InductEV?

2 A. No.

3 Q. Did Ms. Acey ever talk to you about
4 being asked whether she was pregnant?

5 A. No.

6 Q. Did Ms. Acey ever talk to you about
7 being told to see a gynecologist?

8 A. Can you repeat the question? I'm sorry.

9 Q. Sure.

10 Did Ms. Acey ever speak to you about
11 being told that she should see a gynecologist?

12 A. No.

13 Q. Did Ms. Acey ever talk to you about
14 being compared to chocolate ice cream?

15 A. No.

16 Q. Had you ever heard that before?

17 A. No.

18 Q. Did Ms. Acey ever talk to you about
19 being told she was from the wrong side of the tracks?

20 A. No.

21 Q. Did you ever hear about an issue
22 involving a comment like that at work?

23 A. No.

24 Q. Did Ms. Acey ever talk to you about her
25 issues with the cell phone reimbursement process?

1 Q. Mr. Jackson, you were identified by Ms.
2 Acey as someone with knowledge of the facts relating
3 to this case.

4 Do you have any idea why that is?

5 A. No.

6 Q. At this point, I'd like to share my
7 screen. And I'm gonna mark one of the -- known as
8 Exhibit-A. I'll go ahead and share my screen. Bear
9 with me.

10 Can you see my screen?

11 A. Yes.

12 Q. Marking this as Exhibit-1.

13 Mr. Jackson, these are written
14 interrogatories exchanged between the parties in this
15 case. And this case is the defendant InductEV and
16 the plaintiff Ms. Acey.

17 I'd like to direct your attention to
18 this first paragraph. Can you see my curser?

19 A. Yes. I can.

20 Q. I'll go ahead and read this paragraph.

21 Identify all persons who have knowledge
22 of the facts and circumstances relating to the claims
23 or defenses in this action and include a brief
24 description of their knowledge. Please include any
25 and all witnesses to the alleged discriminatory

1 and/or retaliatory acts by defendant.

2 Did I read that correctly?

3 A. Yes, you did.

4 Q. Did you ever talk to Ms. Acey about
5 these interrogatories?

6 A. I can't recall. Is that Steve Brown?
7 Who is Steve Brown? I don't even know him.

8 I can't recall somebody saying I was
9 lazy, in other words being lazy.

10 Q. We're gonna walk through this.

11 A. Okay. I'm sorry. I'm sorry. I went
12 ahead.

13 Q. That's okay.

14 Just in general have you ever seen these
15 interrogatories before?

16 A. No.

17 Q. Did Ms. Acey ever contact you to discuss
18 these interrogatories?

19 A. No.

20 Q. Okay. Did you talk to plaintiff about
21 this deposition by the way?

22 A. No.

23 Q. Or Ms. Acey rather. Excuse me. Okay.

24 I'm gonna scroll down here to where you
25 were identified as a person with knowledge of the

1 facts in this case. Okay?

2 A. Uh-huh.

3 Q. You see this paragraph here?

4 A. Yes. I do.

5 Q. Omar Jackson?

6 A. Uh-huh.

7 Q. I'm gonna go ahead and read this.

8 Omar Jackson. First and only promoted
9 black employee in defendant's history. Originally
10 denied senior title due to employment gap.

11 Do you know what Ms. Acey is referring
12 to here when she says, "employment gap?"

13 A. No.

14 Q. Okay. Do you have any idea why she said
15 that?

16 A. No. There was no employment gap.
17 Explain that to me.

18 Q. I'm not aware of what Ms. Acey means
19 here. I'm gonna go ahead and read the next sentence.

20 Also experienced scrutiny from HR and
21 comments from co-workers.

22 You have any idea why Ms. Acey would
23 have said that?

24 A. No. I don't.

25 Q. Do you agree with this statement that

1 you experienced scrutiny from HR and comments from
2 co-workers?

3 A. No.

4 Q. Is it fair to say that that statement is
5 not accurate? What was that?

6 A. It is not.

7 Q. Not accurate?

8 A. No.

9 Q. Okay. The next sentence reads: Present
10 for a great deal of criticism I received from Rob
11 Rosenberg and other co-workers.

12 Were you ever present for a great deal
13 of criticism Ms. Acey received?

14 A. In the meeting, Rob would say things
15 like -- I can't say -- he was -- he didn't think she
16 was getting the work done fast enough. And he
17 would -- he would state his opinion inside these
18 meetings.

19 On the floor, Rob would never say
20 anything to me or Assata, no. Everything was said in
21 the meetings that I witnessed.

22 Q. So who was Rob Rosenberg, by the way?

23 A. He was a senior technician. He was the
24 first -- he was the senior technician, a part of our
25 team.

1 Q. And he would have had a -- have known
2 whether Ms. Acey was completing the work in a timely
3 manner?

4 A. Yes. I mean -- yes. Yes. Yes; 'cause
5 he -- he was there every day. Yes.

6 Q. Okay. So the criticism that Ms. Acey is
7 referring to here, she's referring to meetings within
8 the company where you would discuss job performance;
9 fair?

10 A. That's the one time I heard Rob say
11 anything about her, yes.

12 Q. Did you ever hear Rob say anything
13 related to race?

14 A. Not in front of me. No.

15 Q. Did you ever take anything Mr. Rosenberg
16 said to be based on race?

17 A. I can't -- no. I can't recall. No.

18 Q. Okay. Did you have any reason to think
19 that Rob Rosenberg had any racial animus toward
20 anybody in the company?

21 A. He didn't have it with me. That's for
22 sure. No.

23 Q. So it's fair to say you had no reason to
24 believe Rob had any type of racial animus toward
25 anyone in the company?

1 A. Not me. No.

2 Q. The next sentence reads. First/only
3 employee to tell me of suspected racial differences
4 in pay.

5 Do you know what Ms. Acey is referring
6 to here?

7 A. When I had that argument, and I was
8 frustrated about my pay and about how I thought.
9 That's the only thing I can think of. That's it,
10 what I testified about earlier.

11 Q. Let me ask you this: Is this line here
12 that you were the first and only employee to tell Ms.
13 Acey of suspected racial differences in pay, is that
14 an accurate representation of what you had talked
15 about with Ms. Acey that day?

16 A. No.

17 Q. How is it inaccurate?

18 A. First and only employee -- I never
19 really looked at -- I just looked at me at that time
20 as far as my pay. Yeah. I -- wow. That was out of
21 context. That's why I don't really say -- wow.

22 Q. Just to confirm, you don't think this is
23 an accurate representation of what you said regarding
24 your pay; is that right?

25 A. Right. I mean I thought at that time I

1 was upset. No; because they gave me raises. No. I
2 don't think so.

3 Q. How long after you complained of your
4 pay did they increase your pay?

5 A. Probably couple months.

6 Q. Okay. Were you satisfied with your pay
7 increase?

8 A. Yes. I was.

9 Q. Were you satisfied with your subsequent
10 promotion?

11 A. Yes. I was.

12 Q. Okay. The next sentence -- let me back
13 up.

14 You're not aware of any racial
15 differences in pay at InductEV; are you?

16 A. I wasn't. No.

17 Q. The next sentence reads: Knowledge of
18 my work on the UV project. Is that the project you
19 referred to earlier?

20 A. Correct.

21 Q. Okay. What about Ms. Acey's work on the
22 project do you recall?

23 A. I know she had -- she was -- Joren put
24 her in a big position. She was -- her cabinets had
25 to go downstairs. She built them.

1 scrutiny based on race; would you?

2 A. No.

3 Q. Okay. With respect to Ms. Acey's
4 comment about coworkers, did you ever experience any
5 comments from coworkers that made you -- strike that.

6 Did you ever experience any comments
7 from co-workers that you thought were inappropriate?

8 A. No.

9 Q. Did you ever experience any comments
10 from co-workers that you viewed as comments based on
11 racial animus?

12 A. No.

13 Q. Are you able to describe how Ms. Acey
14 was perceived by her co-workers?

15 A. They thought she didn't do her job.
16 That's what they thought.

17 Q. Do you know why they thought that?

18 A. No; because Joren thought she was doing
19 okay. That's -- you know, I always take off what
20 Joren would say. Joren thought she was doing her
21 job, so I always did my job. You know, I didn't mind
22 what other people were doing. I mind what I was
23 doing.

24 Joren said she was okay. Joren said she
25 was okay. Some people thought she wasn't doing her

1 this paragraph of the interrogatories?

2 A. No. I don't remember none of that. I
3 wouldn't even put myself in part of no conversation.

4 Q. Understood. Okay.

5 I'll scroll down a little bit to Jorge
6 Rive. Do you see this paragraph here beginning with
7 Jorge Rive?

8 A. Yes.

9 Q. Jorge Rive, witness to some off-color
10 statements and jokes related to sex or race made by
11 Sam during some lunches, and occasionally heard these
12 statements when Sam would visit my work desk.

13 I'll stop there. Do you know who Jorge
14 Rive is?

15 A. Yes. I do.

16 Q. Did you ever witness any off-color
17 statements or jokes he made?

18 A. No.

19 MS. ACEY: I would like to interject.
20 His name is pronounced Jorge.

21 THE WITNESS: Yeah. I just remember how
22 it was spelled.

23 MR. LONGO: Thank you, Ms. Acey, for
24 pointing that out.

25 Q. With respect to Jorge, you had no reason

1 Bear with me. I'm just gonna scroll down in the
2 complaint.

3 I want to direct your attention to
4 paragraph 120 of the complaint. Okay.

5 I'm gonna go ahead and jump around here.
6 Stop me if I lose you. I'll start with paragraph
7 120.

8 It reads: As a black employee, I
9 experienced ongoing and pervasive racial harassment
10 as a condition of my employment at defendant.

11 Mr. Jackson, do you have any
12 understanding of what Ms. Acey is referring to in
13 that paragraph?

14 A. I know what it means, but I didn't
15 witness any of it. No.

16 Q. Okay. I'll scroll down. Paragraph 123
17 here.

18 Do you see this?

19 A. Yes.

20 Q. I'm gonna go ahead and read this
21 paragraph in its entirety, including the subparts.

22 The racial basis of these experiences is
23 informed by circumstantial evidence and prevailing
24 racial stereotypes.

25 Let me stop there. Are you aware of any

1 racial stereotypes that existed at InductEV?

2 A. No.

3 Q. Is that no?

4 A. No.

5 Q. Okay. Right here, subpart A.

6 Harassment described in paragraph 121 was based on
7 adopted racial stereotypes of black people being lazy
8 or untrustworthy.

9 You testified minutes ago you're not
10 aware of any racial stereotypes at InductEV. Are you
11 aware of any racial stereotypes at InductEV with
12 respect to plaintiff's allegation here that black
13 people are lazy or untrustworthy?

14 A. No. No. Go ahead. Go ahead.

15 Q. Black employees such, as me, Ms. Acey,
16 Omar Jackson, and Julian Jackson, were each
17 criticized as lazy on occasions where the reasoning
18 or veracity was inaccurate or disproportionate.

19 I want to stop there and direct your
20 attention to you were described -- not described.
21 Strike that. Criticized as lazy on occasions.

22 Were you ever criticized as lazy,
23 Mr. Jackson?

24 A. Nobody ever told me that.

25 Q. Okay. So you're not aware of what

1 plaintiff is referring to here when she says that you
2 were being criticized as lazy?

3 A. No. I know I wasn't.

4 Q. Okay. So it's fair to say you have no
5 idea what plaintiff is talking about in this
6 paragraph; right?

7 A. No.

8 Q. No. You have no idea what plaintiff is
9 talking about or --

10 A. No. Nobody said that to my face.
11 That's what I'm saying. No. I don't know what she's
12 talking about. No.

13 Q. Do you have a single example of where
14 you felt you were criticized at InductEV due to race?

15 A. No.

16 Q. Did you ever witness any employee at
17 InductEV be criticized for being lazy?

18 A. Yeah. Julian -- they was saying he was
19 lazy; he wasn't moving fast enough.

20 Q. So I understand your testimony, you
21 witnessed Julian be criticized as lazy?

22 A. Yes.

23 Q. How did you witness that? Did you hear
24 it?

25 A. Yes, I did.

1 Q. Do you recall who said that?

2 A. Trying to think about who would have
3 said that. I know it was said, though.

4 Q. At the time --

5 A. I don't remember who said it; but I know
6 it was said. I remember it being like, you know,
7 when you hear it, and then you see it. Yeah. It's
8 like, okay, he just takes his time.

9 Q. At the time you heard that, did you
10 think the criticism had anything to do with race?

11 A. No.

12 Q. Did you have any reason to think it had
13 anything to do with race?

14 A. No.

15 Q. Okay. Did you ever witness anything
16 that you would describe in your own words as where
17 you would take to be harassment at InductEV?

18 A. No.

19 Q. I'm gonna scroll down. Okay.
20 I'm going to direct your attention to
21 paragraph 148. Do you see that?

22 A. Yes.

23 Q. I'm going to read this paragraph.

24 Omar Jackson is a former black male
25 coworker who at the time held 20 years of experience

1 raise, yeah. I told you that from the door. I told
2 you that I should have got that when I came through
3 the door.

4 Q. Understood.

5 But you didn't think that you were not
6 getting any raise; right?

7 A. No. I thought they were dragging their
8 feet.

9 Q. Now, when Ms. Acey refers to
10 controversy, do you know what she's referring to?

11 A. There was no controversy whether I was
12 gonna be a senior tech or not. It was just when they
13 was gonna pay me.

14 Q. So you're not aware of any controversy?

15 A. No, because I talked to Joren
16 extensively about it. He saw me working on it.

17 Q. You testified earlier, in your view, you
18 were promoted because of your extensive experience;
19 right? Because you work hard; right?

20 A. Correct.

21 Q. You made that clear to InductEV during
22 your time working for InductEV; right?

23 A. Yup.

24 Q. And in fact, InductEV recognized that
25 and gave you a raise?

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1 A. Correct.

2 Q. And InductEV promoted you; right?

3 A. Correct.

4 Q. So is it fair to say you disagree that
5 you were only promoted after a controversy?

6 A. Yes.

7 Q. Okay. Let's scroll down to paragraph
8 151.

9 This paragraph reads: To my knowledge,
10 Omar has been the only internally promoted
11 reclassified black employee in the company's 12 year
12 history.

13 I think you testified earlier you don't
14 know whether that is the case; do you?

15 A. I don't.

16 Q. Do you have any idea why Ms. Acey would
17 have said that?

18 A. Like three of us was there when she was
19 there.

20 Q. You don't know whether that statement is
21 accurate?

22 A. I don't.

23 Q. Okay. I direct your attention to
24 paragraph 156.

25 This paragraph reads: Further, Omar's

1 initial classification as a product introduction
2 technician instead of a senior technician lends
3 additional circumstantial evidence to, A.
4 Defendant's ongoing practice of limiting employees on
5 the basis of their race.

6 I'm going to stop there. Are you aware
7 that InductEV has any practice of limiting employees
8 on the basis of their race?

9 A. No.

10 Q. Okay. Do you have any sense why you
11 were initially hired as a product technician?

12 Actually, let me back up.

13 When you applied for your position at
14 InductEV, what position did you apply for?

15 A. The technician job, the entry job.

16 Q. You applied for the product introduction
17 technician?

18 A. Correct.

19 Q. Okay. So when you got that job, it was
20 of no surprise to you, because you had in fact
21 applied for it; correct?

22 A. Correct.

23 Q. When you were subsequently promoted to
24 senior technician, would you agree with me it was at
25 that point you had shown the company that you were

1 qualified for that position?

2 A. Yes.

3 Q. You kind of touched on this earlier.
4 But are you aware of any patterns of racial bias at
5 InductEV?

6 A. No.

7 Q. How about patterns of bias based on
8 gender?

9 A. No.

10 Q. How about patterns of bias based on sex?

11 A. No.

12 Q. I'm gonna stop sharing my screen. Okay.
13 Mr. Jackson, you received a copy of a
14 subpoena with respect to this case; right?

15 A. Correct.

16 Q. I'm gonna go ahead and mark it at this
17 point, or introduce what I will call Exhibit-C.

18 I'm gonna go ahead and share my screen
19 again. Mr. Jackson, can you see my screen?

20 A. Yes.

21 Q. Okay. Again, I'd like to mark this as
22 Exhibit-C. This is the exhibit that was attached to
23 the subpoena you received.

24 Mr. Jackson, does this exhibit look
25 familiar to you?

1 harassed based on race?

2 A. I don't.

3 Q. You don't have any, or you don't know?

4 A. I don't have any.

5 Q. Okay. Do you know whether you have any
6 documents relating to her claim that she was harassed
7 on the basis of sex?

8 A. I don't have any.

9 Q. How about documents relating to
10 accusations of stealing time?

11 A. I don't have any.

12 Q. How about documents relating to whether
13 she was asked if she were pregnant?

14 A. No. I don't have any.

15 Q. How about whether she was recommended to
16 see a gynecologist?

17 A. Nope. Don't have any.

18 Q. How about her claim that she was
19 harassed during the cell phone reimbursement process?

20 A. I don't have any documents. No.

21 Q. How about her claim that she was
22 compared to chocolate ice cream?

23 A. No. I don't.

24 Q. How about her claim that she and other
25 black employees were subject to unfair criticism

1 based on racial stereotypes?

2 A. No. I don't.

3 Q. Bear with me a minute. I'm just gonna
4 review my notes. I'll stop sharing my screen, as
5 well.

6 You testified earlier that Seth -- did
7 you testify that he received -- did not receive the
8 position for senior tech?

9 A. Yeah. Not until I got it.

10 Q. Okay. Not until you received it?

11 A. Right.

12 Q. Okay. And forgive me if you testified
13 to this already. But is Seth Caucasian?

14 A. Yes.

15 Q. Okay. Mr. Jackson, is it fair to say
16 that you have no reason to believe that InductEV made
17 decisions based on race?

18 A. No. I don't believe that. No.

19 Q. You don't believe that?

20 A. No.

21 Q. Give me a one-minute break. I want to
22 review my notes. I might be finished.

23 Mr. Jackson, are you able -- would you
24 be able to locate those communications you referenced
25 earlier, the emails, the LinkedIn messages?

1 us earlier.

2 Q. Were you aware of Steve calling anyone
3 else a slacker?

4 A. No.

5 Q. Mr. Jackson, what do you understand the
6 word "slacker" to mean?

7 MR. LONGO: Objection. Form.

8 A. A person not doing their job.

9 Q. Do you believe that's what Steve meant
10 by the word, slacker?

11 MR. LONGO: Objection. Form.

12 A. Probably so.

13 Q. I'm gonna stop sharing my screen.

14 I want to revisit your testimony
15 regarding Seth Wolgemuth. Do you believe that Seth
16 was qualified for the role of senior technician?

17 MR. LONGO: Objection. Form.

18 A. Based on his work experience, yes.

19 Q. Okay. Did you believe that because of
20 the duration of his experience?

21 MR. LONGO: Objection. Form.

22 A. I don't understand that question right
23 there.

24 Q. Okay. Do you believe that Seth had
25 unique knowledge about the products at InductEV?

1 A. Yes. Yeah.

2 Q. Do you believe that Seth earned his
3 promotion through hard work?

4 A. Yes. Yup.

5 Q. Do you believe that his years of
6 experience in the field was a factor in his
7 promotion?

8 A. I can only speak of what I seen there;
9 and yes, I do.

10 Q. Were you aware of how many years he
11 possessed in the field?

12 A. No.

13 Q. Were you aware of any requirements -- of
14 any experience requirements for the role of senior
15 technician?

16 A. No.

17 Did I do something to the picture?

18 Q. I stopped sharing my screen.

19 A. I got a Veritext screen up here right
20 now.

21 Q. Can you see us?

22 A. I can't see you at all.

23 Q. I don't have many questions left, and I
24 don't really --

25 A. I'm trying to get it back up so I see